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NON-DISCRIMINATION AND ANTI-HARASSMENT POLICY

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INTENT

Whirlpool believes that respectful, professional conduct furthers the Company's mission, promotes productivity, minimizes disputes, and enhances our reputation. Whirlpool expects every employee to show respect for all of our colleagues, customers, and vendors. Harassment by co-workers, supervisors, or any third parties is a form of misconduct that destroys our work environment and undermines the integrity of the employment relationship. The Company is committed to providing a work environment that is free of unlawful discrimination, including harassment that is based on any legally protected status. The Company will not tolerate any form of discrimination or harassment that violates this policy.

NON-DISCRIMINATION

Whirlpool does not discriminate in employment opportunities or practices on the basis of race, color, religion, disability, national origin, genetic information, sex (including pregnancy), age, sexual orientation, gender (including gender identity and expression), marital status, protected veterans status, citizenship status or any other characteristic protected by applicable law.

Our policy of Non-discrimination in employment applies to recruitment, hiring, compensation, promotions, transfers, discipline, demotions, terminations, layoffs, access to benefits and training and all other aspects of employment.

Employees with questions or concerns about any type of discrimination in the workplace are encouraged to bring these issues to the attention of their Manager or the Human Resources department. Employees can voice concerns and submit reports without fear of retaliation. Any Whirlpool employee found to be engaging in any type of unlawful discrimination will be subject to disciplinary action, up to and including termination of employment.

HARASSMENT PROHIBITED

We will provide a safe and pleasant work environment where everyone is treated with fairness and respect. It is against Company policy for any employee to verbally or physically harass or discriminate against another employee on the basis of an individual's race, color, religion, national origin, genetic information, sex (including pregnancy), age, sexual orientation, gender (including gender identity and expression), marital status, protected veterans status, citizenship status or any other characteristic protected by applicable law. Harassment of employees in the Whirlpool workplace by any third party will not be tolerated either. Any employee who violates the company policy against harassment will be subject to corrective action, up to and including termination.

The conduct prohibited by this policy, whether verbal, physical, or visual, includes any discriminatory employment action and any welcome or unwelcome conduct that is inflicted on

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someone because of that individual's protected status. Among the types of conduct prohibited by this policy are epithets, slurs, jokes, negative stereotyping, intimidating acts, and the circulation or posting of written or graphic materials that show hostility toward individuals because of their protected status. The company prohibits that conduct in the workplace, even if the conduct is not sufficiently severe or pervasive to constitute unlawful harassment.

SEXUAL HARASSMENT

Sexual harassment is defined as unwelcome sexual advances; requests for sexual favors and other verbal or physical conduct where:

- Submission to such conduct is either an explicit or implicit condition of employment.
- Submission to, or rejection of, such conduct is used as the basis for employment decisions affecting the person involved.
- Such conduct has the purpose or effect of substantially interfering with an individual's work performance or creating an intimidating, hostile or offensive work environment.

This policy forbids harassment based on gender regardless of whether the offensive conduct is sexual in nature and regardless of whether it rises to the level of a legal violation. Any unwelcome conduct based on gender is also forbidden by this policy regardless of whether the individual engaged in harassment and the individual being harassed are of the same or are of different genders.

Examples of gender-based harassment forbidden by this policy include (1) offensive sex-oriented verbal kidding, teasing or jokes; (2) repeated unwanted sexual flirtations, advances or propositions; (3) verbal abuse of a sexual nature; (4) graphic or degrading comments about an individual's appearance or sexual activity; (5) offensive visual conduct, including leering, making sexual gestures, the display of offensive sexually suggestive objects or pictures, cartoons or posters; (6) unwelcome pressure for sexual activity; (7) offensively suggestive or obscene letters, notes or invitations; or (8) offensive physical contact such as patting, grabbing, pinching, or brushing against another's body.

REPORTING PROCEDURES

Any employee who believes he or she has experienced or witnessed any conduct that is in violation of this policy should report that concern to a supervisor, Human Resources representative, Employee Relations or through the Global Ethics Hotline immediately. These are the individuals authorized by this policy to receive complaints on behalf of the Company. This policy does not require reporting harassment to any individual who is creating the harassment.

Complaints may be made orally or in writing. If a complaint is made orally, the employee may be asked for a written statement during the investigation. All complaints, to the extent possible, should include dates, times, location, details of the incident(s), names of the individuals involved and the names of witnesses to the incident(s). All complaints will be forwarded immediately to Human Resources. Any supervisor who is aware of conduct

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inconsistent with this policy or who receives or learns of a report of conduct inconsistent with this policy must report such conduct immediately to Human Resources.

RESPONDING TO COMPLAINTS

All reports describing conduct that is inconsistent with this policy will be investigated promptly and thoroughly. Employees are required to cooperate in investigations. The Company is committed to maintaining confidentiality to the extent possible. The Company will take all reasonable measures to ensure that the situation is divulged only to those with a need to know.

CORRECTIVE ACTION

We will not tolerate any harassment or discrimination in violation of this policy. If an investigation reveals that a violation of this policy or other inappropriate conduct has occurred, then the Company will take corrective action, including discipline, up to and including termination of employment, as is appropriate under the circumstances, regardless of the job positions of the parties involved. The Company may discipline an employee for any inappropriate conduct discovered in investigating reports made under this policy, regardless of whether the conduct amounts to a violation of law. If the person who engaged in conduct in violation of this policy is not a Whirlpool employee, then we will take whatever corrective action is reasonable and appropriate under the circumstances.

RETALIATION PROHIBITED

Retaliatory treatment of any employee for reporting discrimination, harassment or other prohibited behavior or for cooperating in a harassment investigation is strictly forbidden. All employees who experience or witness any conduct they believe to be retaliatory should immediately report such conduct to a supervisor, Human Resources representative, Employee Relations or through the Global Ethics Hotline.